

# **EXHIBIT**

**1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MYRON WARD,

PLAINTIFF

v.

JOHN LAMANNA, ET AL.,  
DEFENDANTS

Civil Action No. 04-11E

Judge McLaughlin  
Magistrate Judge Baxter

**Declaration of Douglas S. Goldring, Assistant General Counsel**

1. I am an Assistant General Counsel employed by the United States Department of Justice, Federal Bureau of Prisons (BOP), and assigned to Federal Prison Industries, Inc. (FPI or trade name UNICOR). I am licensed to practice law in the Commonwealth of Pennsylvania. I began my service with the BOP on September 27, 1998.
  
2. I am aware that inmate Myron Ward, Register Number 05967-084, filed a civil rights action, in which he alleges that his Constitutional rights were violated as a result of the condition in the UNICOR factory at the Federal Correctional Institution (FCI) in McKean, Pennsylvania.
  
3. According to records maintained in the ordinary course of business by the BOP, Myron Ward is a Federal inmate currently incarcerated in the Federal Correctional Institution (FCI) in Petersburg, Virginia. He was convicted

in the Western District of Virginia of various drug related offenses, in violation of 21 U.S.C. §§ 841, 844, and 846. He was sentenced to 24 years and 4 months in prison on January 15, 1999. His projected release date is July 10, 2018, via Good Conduct Time Release. **Attachment A is a true and correct copy of inmate Ward's Sentence Monitoring Computation Data.**

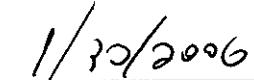
4. At all time relevant to this action inmate Ward was housed in FCI McKean, a medium security facility. Records reflect that he arrived at that facility on or around July 20, 2001. **Attachment B is a true and correct copy of inmate Ward's Inmate History Data.**
5. On or around April 7, 2005, inmate Ward submitted an administrative tort claim relating to the conditions in the FPI factory in FCI McKean. That claim was denied on or around April 28, 2005. **Attachment C is a true and correct copy of Administrative Tort Claim TRT-NER-2005-2686.**
6. As an attorney for the Bureau of Prisons, I have access to the medical records of inmates, that are maintained in the ordinary course of business. **Attachment D is a true and correct copy of inmate Myron Ward's complete medical records**

**up to and including January 2006.**

I declare under penalty of perjury in accordance with the provisions of 28 U.S.C. § 1746 that the above is accurate to the best of my knowledge and belief.



Douglas S. Goldring  
Assistant General Counsel  
Federal Prison Industries, Inc.



Date